

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>AULISTAR MARK, HANCHEN LU and</b>	:	
<b>ANDREW HUDSON, Individually and on Behalf of</b>	:	
<b>All Others Similarly Situated,</b>	:	
	:	
<b>Plaintiffs,</b>	:	Civil Action No. 1:13-cv-04347-AJN
<b>-against-</b>	:	
	:	
<b>GAWKER MEDIA LLC, and NICK DENTON,</b>	:	
	:	
<b>Defendants.</b>	:	
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**AFFIDAVIT OF QUINTON MA**

QUINTON MA declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts sets forth in this Declaration, or I have learned said facts.
2. I served as an intern for the Gawker Media, LLC ("Gawker") website Gizmodo.com in the summer of 2009 between my junior and senior years at New York University.
3. I have always been a big fan of the Gizmodo website. The internship was advertised in a post on the site. To apply, I sent in my resume and a cover letter. I received a reply email from Matthew Buchannan (the Contributing Editor of Gizmodo at the time) that said he wanted me to come in to interview. I believe part of the interview and application process involved the editors determining if I was of the same mindset as the rest of the Gizmodo staff. After I interviewed, Matt offered me the internship for that summer.

4. I received a stipend of \$200 per month to cover lunch and transportation, but did not receive any academic credit toward my degree at NYU. The Gizmodo editors were very clear from the beginning that I would only receive the \$200 stipend and no other payment.

5. Matt was my main supervisor, but I reported at some point to all three main editors of the site.

6. I did not receive formal training, but throughout my internship the editors would give me constant tips and constructive feedback on what I was doing. For example, they would show me how to find a story that was worth writing about for the site. This involved showing me how to identify stories that were interesting to Gizmodo readers, how to research them, and how to pitch ideas myself. I believe that employees were expected to know how to do these things because I never saw them receive similar training.

7. My daily activities included monitoring approximately 200 other blogs from across the web as well as PR Newswire to try to identify stories that would be worth writing about on the site. After I collected a list of stories, I would then conduct background research on the story to see if: (i) it was up to date; (ii) we covered the story on Gizmodo before (and if yes, was it worth doing a follow up story); and (iii) there was enough information to put together a proposal on the story. I would then send the proposal to the editors via Campfire (Gawker's internal chatroom program) to pitch the story idea to them. If they did they liked the idea, they would write a story. If they did not like the idea, they would give me feedback and tell me why and how to improve my search for stories.

8. The internship was a good experience for me because I learned that I did not want to pursue a career in editorial work. Prior to my internship with Gizmodo, I did not know what to do with my life, so learning more about a particular industry was important for me. My experience at Gizmodo also taught me the invaluable skill of how to work with supervisors and how to manage people up and down the chain of command. Even though it was my second or third internship and I had had a boss before, the Gizmodo experience was different. I learned how to work with eccentric characters and people who are really passionate about what they do.

9. At the end of the summer, my internship ended and I went back to school. After I graduated from NYU in May 2010 I applied for the advertising apprentice program at Gawker. It was a full-time eight week rotational program, and I was paid an hourly rate well-above minimum wage. After the eight weeks, I was hired full-time as a Sales Planning Associate on the Gawker marketing team. In that position I worked under Erin Pettigrew (current Vice President of Business Development) and Lindsay Cohen (current Executive Director of Sales Development). I left Gawker in April of 2012 to go to Spotify, where I initially performed work similar to my work in Gawker sales. I now hold the title Business Planning Associate at Spotify.

10. I still have the editorial internship at Gizmodo on my resume, along with the two full-time positions with Gawker I held later on.

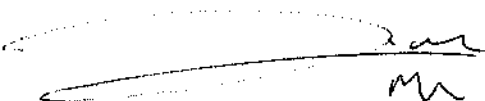
11. My internship at Gizmodo helped me secure my first full-time job at Gawker. It showed me how a digital media company works and helped me to understand the differences and connections between editorial and advertising. My Gizmodo internship also indirectly contributed to getting my job at Spotify, as it is a prestigious

name on my resume among start-ups, and I was able to show that I was interested in working in such an environment early on.

12. Before I provided the information for this declaration, I was asked if I intended to join the current lawsuit (I do not). Before I provided the information for this statement, certain information was communicated clearly to me, including that my participation was completely voluntary. Then, I made a voluntary decision to provide the information for and to sign this statement.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 9<sup>th</sup> day of January, 2014 in New York, NY.

  
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